2014-2016 Performance Partnership Grant

Appendix C: Water Quality Component

Annual Performance Report for July 1, 2014 through June 30, 2015

8-31-15 Draft for review prior to 9-10-15 check-in meeting

Element 1: Water Quality Standards and Assessments

DEQ contact: ~~Debra Sturdevant~~Jennifer Wigal
EPA contact: Angela Chung and David Croxton

Establishing water quality standards for waters of the United States in Oregon is at the core of DEQ's water quality activities. Standards include beneficial uses of water, such as drinking, aquatic life, recreation, etc., and the water quality criteria designed to protect those uses. The Water Quality Program then acts to protect and restore water quality by implementing those standards, including evaluating whether Oregon's water quality standards are being met through the development of the biennial Integrated Report, which includes the section 303(d) list of impaired waters and the section 305(b) report describing the status of Oregon's surface water quality. The staff who work on these program areas perform the following activities:

- Conduct triennial standards reviews to establish and update scientifically based water quality standards and related policies.
- Develop and maintain internal directives for and provide guidance to regional and headquarters staff on implementation of water quality standards in various water programs.
- Identify waterbodies not meeting water quality standards and develop Integrated Reports.

Current staffing levels in the Standards and Assessments subprogram are not sufficient to accomplish all of the commitments listed below. DEQ is pursuing additional state funding to support the subprogram, specifically with respect to a new approach to developing Integrated Reports. The completion of those tasks will be subject to DEQ's ability to secure adequate funding and resources to do the work.

Environmental Outcome: Adoption and implementation of appropriate water quality standards will contribute to protection of the beneficial uses of Oregon's waterbodies and water quality improvements as measured by water quality monitoring and other environmental data.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments as of Aug 2015
1.1	Conduct a rulemaking process to revise ammonia criteria for aquatic life.	Provide early review and input if any concerns arise. Act on submitted criteria in timely manner.	New ammonia criteria recommended to the EQC for adoption and submitted to EPA. Approved criteria	12/31/2014 5/30/2015	Partial		Criteria adopted by EQC Jan 2015. Approved by EPA Aug 2015.

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#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments as of Aug 2015
1.2	Conduct a rulemaking process to revise copper criteria and adopt 4 new pollutant criteria recommended by EPA.	Provide early review and input if any concerns arise. Provide technical assistance on copper BLM and other potential options.	New criteria recommended to the EQC for adoption and submitted to EPA.	~~6~~9/30/2016	Partial		Making good progress. Targeting Oct 2016 EQC adoption; submittal Dec 2016. Assistance from EPA in form of BLM workshop in May was very helpful.
1.3	Conduct a review and prepare for rulemaking to revise Oregon's temperature water quality standard. Determine how to address natural thermal regimes and variability for temperature.	Provide early review and input if any concerns arise.	Project planning and rule development to ~~P~~prepare for standard revision in 2017. ~~to propose new criteria to the EQC for adoption.~~	6/30/2016	Partial		Timing delay associated with delayed BiOp and other related processes.
1.4	Address water quality standards-related action needs (e.g., variances, site-specific background pollutant criteria, UAAs and/or SSC) arising from implementation of revised human health criteria or the remaining effective portion of Oregon's temperature standard.	EPA will work with DEQ on any variance requests or other WQS revisions arising from the recent human health criteria revisions.	Variances and other water quality standards revisions.	Ongoing	Partial		Have informed permittees about when these tools may be appropriate and what the process would be. None have been requested to date.
1.5	Describe antidegradation implementation procedures that address the issues raised in EPA's review of Oregon's	Input on identifying practicable and reasonable implementation procedures necessary to meet	Updates to Antidegradation Implementation	6/30/2015	Partial		Completed addendum to IMD on

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	Antidegradation Implementation guidance document (IMD).	minimum requirements of the CWA and federal regulations.	IMD (may be in form of addenda).				existing use review where there is no lowering of water quality.
1.6	Conduct rulemaking to correct error in applicability of the pH criteria to the Snake River (correct river miles specified). Evaluate need to revise the pH criterion for the Snake and Columbia Rivers and the Owyhee and Malheur River basins.	Early input on possible revisions to criteria. Timely action on revised criteria.	Revised pH criteria for Snake R. to correct error in current rule. Possible additional pH revisions.	12/31/2015	Partial		Criteria adopted by EQC Jan 2015. Approved by EPA Aug 2015.
1.7	Conduct rulemaking to amend bacteria standards for coastal waters, including adopting the enterococci criteria for coastal recreation, amending the fecal coliform criteria to apply to shellfish harvesting waters, and designating these uses.	Early input on possible revisions to criteria. Timely action on revised criteria.	Revised standards recommended to the EQC for adoption and submitted to EPA.	9/30/15	Partial		This work is required by EPA if the state wishes to receive federal funds for beach monitoring. These criteria will replace federal criteria for coastal recreation. Targeting EQC adoption by Sept. 2016; submittal by Oct. 2016.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments as of Aug 2015
1.~~7~~8	Identify and plan next set of standards work to be completed based on water quality program needs and stakeholder input (triennial review). Upon completion of this planning process, provide EPA with a list of possible additional water quality standards revisions that could be undertaken subject to resource availability and priorities.	Provide input to DEQ on standards work needs and priorities. Coordinate with the Services on actions requiring ESA consultation.	Standards work plan that identifies needs and priorities. Proposed standards revisions, as time and resources allow	6/30/~~2015~~2016	Partial		Delayed due to added tasks, e.g.: bacteria rulemaking, DO discussions and letter, Temp BiOp timing.
1.~~8~~9	DEQ will submit Oregon's 2012 303(d) list to EPA, which will include an assessment of toxics data. DEQ will update Oregon's Integrated Report on water quality and 303(d) List pending EPA's approval. DEQ will distribute final approved 303(d) list and Integrated Report for agency and public use.	EPA will review and take action on updates to 303(d) list. EPA will extract information from Oregon's databases to populate EPA databases (WATERS, ADB, NAD) and compile information for national reports.	Oregon's 2012 Integrated Report and 303(d) list, and list of TMDL priorities	~~9/30/2014~~Submitted November 5, 2014 Ongoing update work Fall 2015	Partial		DEQ's report assessed select toxic pollutant data statewide and dissolved oxygen for Willamette Basin and Umatilla Subbasin. DEQ's final updates are pending EPA partial approval/partial disapproval and 303(d) addition actions.
1.~~9~~10	DEQ will assist EPA in identifying relevant data elements and georeferenced information to contribute to EPA's national data roll-ups and national measure target determinations. DEQ will assist EPA and EPA contractors in developing a list of potential candidates to meet national measures and in the	EPA will extract information from Oregon's databases to populate EPA databases (WATERS, ADB, NAD) and compile information for national reports.	Oregon Integrated Report	Ongoing Candidate measures and success stories coordinated with DEQ NPS and	Partial	WQ-7	National reporting pending EPA final actions on 2012 303(d) list. See Element 8.3 for

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments as of Aug 2015
	development of appropriate success stories.			regional staff and EPA December 2014			measures and success stories.
1.~~10~~11	DEQ will develop an effective and sustainable approach to producing complete and timely Integrated Reports. Such approach will need to identify and develop staffing resources and data infrastructure and evaluation processes and tools. DEQ's priority will be to develop GIS and automated data analysis tools and processes needed to determine impairment and streamline the assessment process.	EPA will provide input on approaches, tools and processes as they are developed by DEQ.	~~A project plan that includes recommended tasks and resources to implement.~~ DEQ's Water Quality Assessment Integrated Report Strategic Plan under development ~~Initial tasks are being implemented.~~	~~6/30/2015Draft Strategic Plan 3/2015~~ ~~6/30/2016~~Ongoing project planning	Partial		Strategic Plan under internal DEQ review. Final plan by Sept. 2015. EPA still reviewing DEQ's 2012 IR.
1.~~11~~12	DEQ will track the development and modifications to EPA's water quality framework (ATTAINS). DEQ will evaluate whether this system would meet Oregon's needs.	EPA will continue provide information to DEQ on the development of ATTAINS and notify DEQ of opportunities to provide input. EPA will consider DEQ requirements during database development.		~~Ongoing~~DEQ work with EPA's ATTAINS redesign planning completed August 2014. Ongoing DEQ work with EPA ATTAINS Integrated Project Team	Partial		ATTAINS IPT work to finish Fall 2015

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments as of Aug 2015
1.~~12~~13	DEQ will review and prioritize needed updates to the IR assessment methodology. After an initial planning process, DEQ will identify which water quality standards assessment methodology updates and revisions could be undertaken this biennium, subject to resource availability and priorities. DEQ will consider whether methodology updates for biological criteria can be completed during this time period.	EPA will support the technical analysis and data review necessary for assessment protocol development. EPA will work with DEQ on approach for waters where narrative criteria are not met but no pollutant is identified for TMDL development.	~~Updates/new protocols for Oregon Assessment Methodology for Integrated Report on Water Quality Status~~DEQ/EPA quality review of biological data and protocols as part of EPA's 2012 review. Identification of methodology updates to be completed this biennium.	DEQ will initiate work on methods as described in Strategic Planning effort. See 1.11.~~Ongoing review of methods to assess biological criteria with EPA 303(d) additions Summer 2015~~ ~~6/30/15~~	Partial		EPA action on 2012 303(d) list will include review of biocriteria data and protocols. DEQ will provide comments. DEQ will incorporate OR 2015 statue changes for developing DEQ assessment protocols and develop priorities for assessment methodology updates as part of planning process.~~.~~

Element 2 : TMDLS
DEQ contact: Gene Foster
EPA contact: David Croxton

Total Maximum Daily Loads (TMDLs) and Water Quality Management Plans

The federal Clean Water Act requires that water pollutant budgets, called TMDLs, be developed for waterbodies that do not meet water quality standards. TMDLs describe the maximum amount of pollutants from municipal, industrial, commercial and surface runoff sources, including natural background, which can enter the river or stream without violating water quality standards. These estimates are required for waterbodies that have been identified as in violation of one or more water quality standards at some time, and have been included on one of DEQ's 303d lists of water quality limited waterbodies.

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DEQ develops TMDLs on a basin or subbasin scale (generally on a 3rd field US Geological Survey Hydrologic Unit Code or smaller). These TMDLs address all sources of pollutants when determining allocations of loading for the pollutants being addressed by the TMDL. These allocations are developed through water quality analysis, statistical analysis, and mathematical modeling. Staff in the program conduct all facets of work in collecting, analyzing and presenting results. Staff will also perform public and stakeholder outreach to ensure input when decisions are being made. The combination of outreach and development provides for the transition from development of loading allocations to implementation in permits and watershed plans.

TMDL Wasteload Allocations are implemented through waste limits in permits for point source discharges, and Load Allocations are implemented as planning targets for other sources and designated management agencies. DEQ staff actively implement TMDLs by:

- Revising industrial and municipal wastewater permits to incorporate revised permit limits.
- Working with local communities and the Oregon Department of Agriculture through the Agriculture Water Quality Management Act process to implement the TMDLs effectively on agricultural lands.
- Working with the Oregon Department of Forestry for implementation on state and private forestlands, through the Oregon Forest Practices Act and long range management plans.
- Assisting local governments in developing TMDL Implementation Plans for urban areas.
- Working with the U.S. Forest Service, Bureau of Land Management and other federal agencies on developing water quality restoration plans for lands under their jurisdiction.
- Working with ODA, ODF, and other DMA's on TMDL implementation planning timelines, milestones for pollutant reduction targets and strategies to reduce pollutants, such as sediment, temperature, nutrients and bacteria.

Under most circumstances, TMDL Implementation plans for improved water quality rely on cooperation among landowners and land managers within a river basin. Local watershed councils, Soil and Water Conservation Districts or other organizations will serve as community-based coordination points for these united efforts. Agencies and municipalities with jurisdiction over sources of nonpoint source pollution and sources not covered by permit are required to submit TMDL implementation plans to DEQ. These plans describe actions that will be taken to reduce their contribution to Water Quality problems.

EPA, with input from the states, has developed a new long term vision for assessment, restoration, and protection under the Clean Water Act Section 303(d) Program that was finalized December 5, 2013. The EPA Vision document includes the components: prioritization, assessment, protection, alternatives, engagement, and integration. The states have been requested to develop a plan that is consistent with EPA's 303(d) Vision by December 31, 2014.

Environmental Outcome: Development and implementation of TMDLs will contribute to protection of the beneficial uses and meeting water quality standards in Oregon's waterbodies and water quality improvements as measured by water quality data and other environmental data and measures in TMDLs, WQMPs and TMDL implementation plans.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comment
2.1	Develop TMDLs and WQMPs in accordance with 303(d) list schedule.	Technical Assistance; Review and approve	Issuance of TMDLs for the: - Coquille Basin - MidCoast Basins - Chetco Basin - Sixes Basin	 12/14 12/15 6/16 6/16	Partial	WQ-8b	TMDL Issuance: Coquille: expected 4Q 2015

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comment
			Begin Powder/Burnt Basins TMDL Development Upper Deschutes Basin TMDL Development Begin Coos TMDL development	3/15 Ongoing 6/15			MidCoast: expected 3/4Q 2016 Chetco: expected 3/4Q 2016 Sixes: expected 3/4Q 2016 TMDL Development: Powder/Burnt: ongoing Upper Deschutes: ongoing TMDL Development Startup: Coos: expected 4Q 2015
2.2	Implement TMDL Wasteload Allocations in NPDES permits through collaboration with NPDES permit writers.		Pollutant Discharge Limits that will meet WLAs for each permitted discharge.	Ongoing	Partial		Ongoing
2.3	Implement the Willamette River Basin TMDL. Work with watershed councils, local governments, and other DMAs to develop appropriate management practices and plans for controlling pollutants to the Willamette River. Work with USDA agencies to leverage Farm Bill resources to implement priority best management practices in critical areas.		Completed Implementation plans throughout Willamette Basin that guide management practices, pollutant controls to meet load allocations in TMDLs. Facilitate projects that result in improvements in water quality.	Ongoing	Partial		Ongoing: DEQ five year report on Willamette TMDL Implementation released
2.4	Implement TMDLs for Nonpoint Sources in subbasins where TMDLs/WQMPs have been completed. Work with watershed councils, local governments and other DMAs to develop		Completed Implementation plans that guide management practices, pollutant controls to meet load allocations in	Ongoing	Partial	WQ-10	Ongoing

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comment
	appropriate management practices and plans for controlling pollutants. Work with USDA agencies to leverage Farm Bill resources to implement priority best management practices in critical areas.		TMDLs. Facilitate projects that result in improvements in water quality.				
2.5	Implementation of load allocations or require TMDL implementation plans for all sources assigned load allocations.	Review and provide input to DEQ on Mid-Coast and North Coast Basin implementation plans	Implementation plans that meet load allocations or management measures identified in the TMDL/WQMP.	Ongoing	Partial		Ongoing
2.6	Work with EPA to develop a plan that is consistent with EPA's 303(d) Vision by December 31, 2014. This plan may describe ODEQ's process, actions, or determinations on the following components of EPA's 303(d) Vision: prioritization, assessment, protection, alternatives, engagement, and integration.	Review and provide input to DEQ on TMDL Program planning documents	Incorporate the components of EPA's 303(d) TMDL Vision into the TMDL Program planning documents.	Ongoing	Partial		Ongoing

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Element 3: Underground Injection Control
DEQ contacts: ~~Anita Yap~~ Ron Doughten
EPA contacts: ~~Dave Tetta~~Evan Osborne

Underground Injection Control Program

The Underground Injection Control (UIC) program protects drinking water sources and aquifers by providing oversight on the use of injection systems (dry wells, sumps, large onsite wastewater treatment systems, geothermal, aquifer storage and recovery (ASR), remediation injection, etc.) that discharge to the subsurface and may endanger groundwater quality. Federal regulation requires DEQ to keep an updated inventory of all injection wells and report them to the EPA annually. In Oregon, the majority of injection systems are associated with stormwater discharge, large onsite wastewater, aquifer remediation, and industrial process/wastewater. Injection systems must obtain approval from DEQ to operate under Authorization by Rule, a UIC-WPCF permit, or must be formally closed. DEQ staff review and approve applications of a variety of injection system types, provide technical assistance to private and public injection well owners, and work closely with municipalities in their development of stormwater management plans related to injection systems. As a delegated program under the Safe Drinking Water Act, injection systems are subject to EPA enforcement.

During the performance period DEQ will focus on developing approaches to make the UIC program financially sustainable. DEQ is also working on a new general permit. The new general permit is intended to be less complicated for both stakeholders and the DEQ. In order to issue the general permit, DEQ must proceed with rule making to implement a fee for the permit. These items are priorities for the program and are in addition to DEQ commitments in this agreement.

Environmental Outcome: These activities help to ensure that adequate controls are in place so that UICs do not result in water quality standards violations, which will contribute to water quality improvements as measured by water quality monitoring and other environmental data.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
3.1	Continue administration of UIC program by providing Authorization by Rule site reviews, developing WPCF permits and closures.	EPA will provide enforcement and compliance assistance as requested by and in close coordination with DEQ.	Wells inventoried and registered per year; Authorization by Rule determination process (e.g., requesting additional information, providing clarification on application issues, retrofits) will occur as needed. Issue approximately 12 areawide UIC- WPCF Permits a year. Approximately 30 closures approved per year, including an average of 5 motor vehicle waste	Ongoing	Partial	SDW-8, SDW-7b	Ongoing

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
			disposal wells per year or as they are located.				
3.2	Provide technical assistance to consultants, cities, municipalities and other public and private UIC owners.	EPA will provide inspector training opportunities; provide training/outreach to municipalities and other public and private UIC owners, as requested.	Technical assistance will include meetings with municipalities. and other private and public UIC owners.	Ongoing	Partial		Matt Kohlbecker and Derek Sandoz have met in person with approximately 12 municipalities regarding their WPCF UIC Permits.
3.3	Develop a project plan with priorities, interim deliverables and timelines, to upload the DEQ UIC database to the national system via the central data exchange.	EPA will review and provide comments on the proposed project plan.	A project plan identifying priorities, tasks, timelines and deliverables.	8/14 for the draft project plan, final project plan complete 30 days after receipt of EPA comments	Partial		Draft completed in September 2014. EPA hired replacement staff in July 2015. Communication with new staff is ongoing. Expecting EPA response by 10/15. Completed in Nov. 2014. Delayed by EPA need to hire replacement staff.
3.4	Update the internal UIC database to align with EPA's UIC national database and	EPA will provide technical assistance to DEQ as needed to ensure database functionality.	A successful and complete upload of ODEQ's UIC database to the national system via the	12/15	Partial		QA/QC of UIC Database is underway. OpenNode2

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
	upload records to EPA database.		Central data exchange, which meets EPA QA requirements.				access granted to Derek Sandoz in 8/2015. Currently on track to upload in 12/15.
3.5	Develop a project plan, with deliverables and timelines, to address EPA identified UIC re-delegation issues. Deliverables may include rule making to address EPA issues.	EPA will review and provide comments on the project plan and on proposed rule revisions, if necessary.	A project plan identifying tasks, timelines and deliverables.	7/14 for the draft project plan, final project plan complete 30 days after receipt of EPA comments	Partial		Draft project plan completed and submitted. Delayed by EPA need to hire replacement staff.
3.6	Provide UIC program approval package to EPA for redelegation from EPA to DEQ for program primacy.	EPA will review program delegation package in a timely manner.	Program approval package submitted to EPA includes and addresses the required program elements addressing program revisions for redelegation that results in program redelegation.	12/14 if no rule revisions required, 6/16 if rule revisions required.	Partial		Submitted to EPA in Nov. 2014 and under review. Delayed by EPA need to hire replacement staff. Peter Contreras said they will respond when recent hire, Evan Osborne, is up to speed.

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Element 4: Groundwater Program
DEQ contact: ~~Anita Yap~~ Ron Doughten
EPA contact: Eric Winiecki

Groundwater Program

The Groundwater Quality Protection Act of 1989 provides the framework for comprehensive groundwater management and protection in Oregon. This Act and the federal Safe Drinking Water Act establish the critical elements for enhancing and protecting Oregon's groundwater resource for its many beneficial uses. Over ninety percent of Oregon's available freshwater is stored beneath the earth's surface as groundwater. Approximately 70 percent of Oregon's people depend on groundwater for their daily water needs via private, public and industrial water wells.

Oregon focuses most of its groundwater protection activities in three sensitive groundwater areas called "Groundwater Management Areas"; one is located in the Lower Umatilla Basin, one in Northern Malheur County and another in the Southern Willamette Valley. Protection efforts in these management areas involve the implementation of groundwater action plans where the water quality has been degraded, beneficial uses are seriously impaired, and public health may be at risk in part from nonpoint source groundwater pollution. Oregon also provides technical assistance to communities and watershed councils engaged in groundwater pollution prevention efforts.

Environmental Outcome: Groundwater protection efforts will help to prevent the degradation of Oregon's groundwater resources and maintain or improve the quality of groundwater resources, as measured through the various groundwater monitoring efforts DEQ conducts around the state.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
4.1	Implement the Lower Umatilla Basin Groundwater Management Area Action Plan by focusing on agricultural, residential, commercial, industrial, municipal, and public water supply activities that will prevent and reduce nitrate contamination in groundwater.	EPA will provide technical support as needed.	Coordination - Meet with local stakeholders, Groundwater Management Committee, and local agencies to coordinate Action Plan activities. - Provide technical support. - Research BMPs and their effectiveness. Education and Outreach - Organize education and outreach efforts to increase awareness of groundwater vulnerability and BMPs, including participation at	Meet as needed; typically 6 meetings per year Ongoing Ongoing Annually Ongoing Quarterly	Partial		Project on schedule and Committee meeting every other month to develop Action Plan. Educated over 750 kids at Outdoor Schools and similar events.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
			"outdoor schools" and farm fairs. - Maintain GWMA website. Monitoring and Data Analysis - Monitor groundwater quality at 32 domestic and irrigation wells to evaluate impacts and effectiveness of Action Plan. - Complete groundwater nitrate trend analysis for entire GWMA (including food processor sites) - Evaluate success of BMP awareness and implementation.	2014 Every four years			Monitoring continues GWMA-wide trend analysis completed; Food processor trend analysis re-scheduled for 2015 Most recent evaluation completed January 2013
4.2	Implement the Northern Malheur County Groundwater Management Area Action Plan by focusing on agricultural, residential, commercial, industrial, municipal and public water supply activities that will prevent and reduce nitrate contamination in groundwater.	EPA will provide technical support as needed.	Coordination - Meet with local stakeholders, Groundwater Management Committee, and local agencies to coordinate Action Plan activities. - Provide technical support. - Research BMPs and their effectiveness. Education and Outreach - Organize education and outreach efforts to increase awareness of	Meet as needed; typically 1 meeting per year Ongoing Ongoing Annually Quarterly	Partial		Committee met as needed. Monitoring continues Conducted in 2014;

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
			groundwater vulnerability and BMP. Monitoring and Data Analysis - Monitor groundwater quality at 36 domestic and irrigation wells to evaluate impacts and effectiveness of Action Plan. - Complete groundwater nitrate trend analysis. - Evaluate success of BMP awareness and implementation.	2014 Every four years			Finalized in 2015
4.3	Implement the Southern Willamette Valley Groundwater Management Area Action Plan by focusing on agricultural, residential, commercial, industrial, municipal and public water supply activities that will prevent and reduce nitrate contamination in groundwater.	EPA will provide technical support as needed.	Coordination - ~~Meet with~~ Facilitate information sharing and coordinate initiatives of local stakeholders, Groundwater Management Committee, and local agencies ~~to coordinate~~ coordinate with implementation of Action Plan activities. - Provide technical support. - Research BMPs and their effectiveness. Education and Outreach Organize education and outreach efforts to increase awareness of groundwater vulnerability and BMPs, ~~including 2 demonstration projects and 2 workshops~~.	3-4 SWV GWMA Committee meetings per year Ongoing Ongoing ~~2 demonstration projects per biennium; 2 major~~ Ongoing outreach/education with local stakeholders ~~events per year~~ Ongoing 2-4 times per year	Partial		DEQ convened and facilitated GWMA Committee meetings in October 2014, January 2015, and May 2015. DEQ led the Committee in their drafting of amendments to the 2006 Action Plan, supported by continued quarterly monitoring

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
			- Maintain GWMA website. Monitoring and Data Analysis - Monitor groundwater quality at 25 monitoring wells and 15 domestic wells to evaluate impacts and effectiveness of Action Plan. - ~~Conduct nitrate well water screening events~~. - Evaluate success of BMP awareness and implementation.	~~10~~ 8events per biennium As scheduled			of GWMA well network for groundwater quality. DEQ also assisted OSU Extension with public inquiries regarding groundwater protection and BMPs, including updated website information and one-on-one technical assistance.
4.4	Each year, two geographic areas will be identified for groundwater monitoring activities beginning in 2014 with complete coverage of the state over a ten year cycle. Groundwater monitoring locations and timing will be prioritized to complement the information needed for developing the Basin Assessment reports DEQ uses for planning geographically-targeted water quality protection activities. Department, the Oregon Department of Agriculture		Monitoring and Data Collection - Monitoring at approximately 50 wells (combination of domestic wells and monitoring wells) in a geographically targeted area of Oregon outside of the GWMA's. - Nitrates and targeted analytes based on known or suspected risk factors.	Ongoing beginning in November of 2014	No		We have conducted two monitoring events at 120 domestic wells in the Rogue Basin and monitoring in the North Coast will begin this September

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4.5	Complete federal and state groundwater reporting requirements.		- Biennial Report to the legislature. - Groundwater component of 305(b) report.	12/30/2014 As scheduled	Partial		
4.6	Participate in EPA-sponsored annual groundwater meetings and conferences as workload and resources allow.	EPA will provide timely notice and organization of meetings.	Meetings	As scheduled	Partial		

Element 5: WQ Permitting, Pretreatment and 401 Certifications

DEQ contact: ~~Dennis Ades,~~ Ron Doughten ~~Anita Yap~~, Steve Mrazik
EPA contact: Mike Lidgard

Industrial and Domestic Wastewater Permitting

DEQ's wastewater management program regulates and minimizes adverse impacts of pollution on Oregon's waters from point sources of pollution. The term "point source" generally refers to wastewater discharged into water or onto land through a pipe or a discernible channel. These point sources operate under the terms of a federal National Pollutant Discharge Elimination System (NPDES) or state Water Pollution Control Facilities (WPCF) wastewater discharge permit issued by DEQ.

DEQ has had authority for NPDES permit issuance since 1974. As a delegated program, DEQ's NPDES permitting activities are subject to EPA oversight. Effective implementation of the program is required for continued delegation of the water quality program and is essential to the continued receipt of federal program funds. To effectively protect water quality, DEQ must carry out five activities:

- Issue discharge permits that adequately evaluate and limit pollutant discharges to prevent an impact on receiving waters and the beneficial uses of those waters (drinking, swimming, fishing, aquatic habitat, etc.).
- Periodically inspect facilities and review monitoring results.
- Update and maintain EPA's ICIS database with timely and accurate permit and permit related data (DMRs, Compliance Schedules, Inspections, etc.).
- Take prompt and appropriate enforcement actions when violations occur.
- Give essential technical assistance for facility owners and operators to help assure ongoing compliance at minimum expense to permit holders.

DEQ currently manages about 5,600 water quality permits including 3,500 federal NPDES permits and 1,500 state WPCF permits. Achievement of permit program objectives requires targeted and effective implementation of water quality standards following a watershed approach. Program staff requires up-to-date tools and training to consistently develop and issue high quality permits statewide and ensure effective permit implementation. Targeted program implementation is based on source-specific and watershed-specific priorities. Integrated planning can be an effective strategy to respond to multiple mandates with limited resources. DEQ intends to work collaboratively with EPA to implement EPA's Integrated Planning Framework within the framework of the NPDES program.

DEQ will focus considerable effort on stormwater program implementation and development during the biennium. It is expected many of the approximately 800 permitted sources will exceed stringent benchmarks of the industrial stormwater general permit. DEQ and its agents will develop and provide guidance and technical assistance to facilitate timely development and implementation of tier two correction plans necessary to ensure compliance with the general NPDES permit and desired environmental outcomes. DEQ will also continue development of a general municipal stormwater permit for small and medium sized (phase two) communities and districts with an emphasis on TMDL implementation.

Wastewater and stormwater program workload continues to expand in scope and complexity. DEQ will revise and renew the 700PM general NPDES permit for instream placer mining operations. Hundreds of miners register for permit coverage each year and new, more restrictive criteria will result in greater protection of water quality in waterways designated as essential salmon habitat or that are impaired because of elevated levels of sediment, turbidity or toxic pollutants. DEQ will also continue to implement stringent aquatic life and human health criteria as individual NPDES permits are issued or renewed. DEQ will continue to pursue innovative approaches such as pollutant trading, integrated planning and natural treatment systems, to comply with NPDES requirements while more broadly addressing watershed and local community priorities.

Pretreatment Program-~~Dennis Ades~~Ron Doughten

Pretreatment regulations establish responsibilities and standards to control pollutants from industrial users that discharge wastewater to a collection system and publically owned treatment works. Toxic pollutants and other industrial contaminants may pass through or interfere with wastewater treatment processes or may contaminate sewage sludge. The POTW acts as the control authority for these industrial users and monitors the wastewater they discharge to determine whether they are in compliance with the pretreatment standards. DEQ oversees each of the 26 facilities in Oregon with a formal pretreatment program and also provides assistance to smaller facilities that are not required to have a pretreatment program but take additional measures to protect the collection system and treatment works and the environment.

Biosolids Program–~~Anita Yap~~ Ron Doughten

Biosolids are wastewater solids that have undergone sufficient treatment to make them safe for land application. These wastewater residuals are desirable fertilizers and soil conditioners. DEQ works with domestic wastewater treatment facilities to assure proper stabilization, application, management, and monitoring of solids on sites used to improve soil tilth and to grow a variety of crops. Biosolids applications are controlled by detailed site authorization letters that together with biosolids management plans, are linked directly to the Water Quality permits of wastewater treatment facilities.

Wastewater Reuse–~~Anita Yap~~ Ron Doughten

DEQ staff work with municipal and industrial wastewater facilities to permit the recycling of treated wastewater effluent and provide technical assistance to those facilities engaged in the practice of reuse. Wastewater reuse is a tool in the “tool box” for municipalities and potentially industrial wastewater dischargers as another option for managing their treated wastewater. Having additional “tools” provides these stakeholders with options that may be more economical and/or environmentally sound, and can be an additional source of water for non-drinking water practices. Most wastewater reuse occurs through land application to crops and golf courses, and there is increasing interest to reuse treated effluent for industrial and commercial applications. DEQ works with the Oregon Healthy Authority and Water Resources Department on the permitting of this practice.

401 Water Quality Certification–Steve Mrazik

Section 401 of the federal Clean Water Act requires that any federal license or permit to conduct an activity that may result in a discharge to waters of the State receive certification from DEQ that the activity complies with water quality requirements and standards before the activity is allowed. In order to provide a certification, DEQ reviews proposed project applications to dredge, fill, or otherwise alter a waterway or wetland to ensure that the projects will meet water quality program requirements. The federal relicensing of hydroelectric projects also requires a 401 water quality certification (WQC) from DEQ as a condition of the operating license of the facility.

For dredge and fill projects, DEQ issues approximately 150 individual WQCs per biennia that contain conditions that provide protective measures for water quality and beneficial uses. DEQ provides support for EPA reviews of 401 water quality certification program activities related to proposed dredge and fill projects. Additionally, DEQ provides a great deal of technical assistance throughout the permit process. DEQ also issues programmatic type WQCs that cover groups of activities with protective conditions in an effort to provide a streamlined approach to the regulatory process.

During the course of this PPA/PPG, EPA may allocate funds that could be used to enhance the state’s 401 program. DEQ will work with EPA to identify any potential for requesting specific funding from EPA to enhance 401 reviews, oversight and field reviews consistent with existing program objectives. EPA will notify DEQ of any potential funding opportunities and respond to any DEQ request for additional funding.

APPENDIX C: WATER QUALITY PROGRAM COMPONENT

Environmental Outcome: These activities help to ensure that adequate controls are in place so that point source discharges, dredge and fill activities and the recertification of hydroelectric projects do not result in water quality standards violations and will contribute to water quality improvements as measured by water quality monitoring and other environmental data.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
5.1	Continue to issue and reissue NPDES and permits. There are approximately 1200 individual permittees in Oregon, including 69 NPDES majors and 287NPDES minors. DEQ will improve the NPDES permit issuance rate during this agreement period in order to reduce the backlog of expired permits. Strive towards EPA's national target to operate a program with less than a 10% backlog rate on a facility basis.	EPA will review DEQ NPDES permits which contain compliance schedules. EPA review of these permits will occur prior to public notice. EPA may also review permits during the public notice process and proposed final permits consistent with the Memorandum of Agreement. EPA's goal is to average one permit review per month during this period. EPA's designee for reviewing draft permits is Karen Burgess.	Develop and implement a permit issuance plan by February of each year that identifies specific NPDES permits intended to be reissued during the upcoming year. Transmit the issuance plan to EPA annually. Improve permit issuance rate during this biennium in order to reduce the current backlog of expired permits.	2/15 2/16 Ongoing	Partial	WQ-12 WQ-19a	DEQ averaged 40% NPDES individual permits current for this first year, but is making progress towards resolving the permit backlog. As a result of an agency-wide project, DEQ implemented a permit issuance and inspection plan for NPDES and WPCF permits in October 2014. The 2015 Oregon Legislature approved DEQ's request for a one-time 12 percent fee increase to restore 6 FTE, adding two new senior permit writing positions for wastewater permitting The additional funds also support replacement of WQSIS, including one new systems position and budget position for contracts.

APPENDIX C: WATER QUALITY PROGRAM COMPONENT

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
5.2	Issue "Priority Permits" as identified jointly with EPA at the start of each federal fiscal year.	EPA will work with DEQ staff on identification and tracking of priority permits.	Issue 80% of the priority permits identified during each federal fiscal year cycle, subject to available resources.	Ongoing			DEQ committed to issuing 18 Priority Permits in FY2014 and issued 13 Priority Permits. For FY2015 DEQ has committed to issuing 26 permits and has issued 13 as of July 31, 2015. Based on DEQ's permit issuance plan and renewal schedule for FY2015, updated on July 15, 2015, DEQ anticipates meeting the Priority Permit commitment number for FY2015.
5.3	Participate with EPA in a Permit Quality Review (PQR) of the Oregon NPDES program in 2015. Review and comment on draft PQR report	EPA will initiate and coordinate the PQR review with ODEQ. The process will involve EPA review of ODEQ permits and records and an on-site meeting in Oregon. EPA will develop the draft and final PQR reports.	Final PQR report issued by EPA in 2015.	2015			The PQR is scheduled for the week of September 14-18, 2015. EPA Region 10 requested information from DEQ to prepare for the PQR. A pre-assessment questions and supporting information was submitted to EPA on July 31, 2015.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
5.4	Implement revised water quality criteria for aquatic life and human health in the NPDES program.	Technical Assistance (TA); EPA timely review and comment on draft policies and guidance.	DEQ will evaluate NPDES effluent data for toxic pollutants that may contribute or cause an exceedence of water quality criteria using a revised and comprehensive methodology.	Ongoing			Completed in Spring 2015.
5.5	Develop state-wide permit policies, guidance and tools to make the permits program more consistent, effective and efficient. This includes identifying and developing experts on various permit subjects such as mixing zones and reasonable potential analysis to improve permit quality and consistency.	Technical Assistance (TA); EPA timely review and comment on draft policies and guidance; and other program support as needed.	Revise permit templates and guidance as necessary to reflect program developments. Continue to develop and implement training curriculum. Conduct permit writer's workshop. Develop fee rulemakings.	Ongoing As scheduled Annually	Partial		The permit template was modified in October 2014 and again in May 2015. Some of the more significant changes involve the QL language and toxics monitoring protocols. A Permit Writers' workshop was conducted on May 5-6, 2015. Topics covered include antibacksliding, SSOs, hauled waste, mercury minimization plans, updates to the RPA spreadsheet, EPA's sufficiently sensitive rule and how DEQ is complying. It was helpful to have Karen Burgess in attendance for interactive collaboration on permitting issues and

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
							providing EPA policy perspective. The monthly Senior Permit Writers group meetings has discussed over the last year include: modifications to the RPA spreadsheet for ammonia to reflect the new ammonia criteria, electronic data delivery of toxics data, requirement to inspect outfalls once/permit cycle, excess thermal load calculations for intermittent sources, EPA's sufficiently sensitive rule, antibacksliding and more. A 2.9 percent fee increase for individual and general NPDES permits as well as the state's WPCF permits.took effect Dec. 1, 2014. DEQ will pursue a one-time, 12 percent fee increase during the 2015-17 biennium to take effect on Jan. 1, 2015.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
							DEQ is developing an internal permit issuance model that would use a team approach, and include experts in identified permitting areas. In the fall 2015, DEQ will initiate recruitment for two new positions to support permit issuance. 0.5 FTE will be dedicated to permit review, intended to ensure standard quality measures and consistency among issued permits.
5.6	Permits shall include water-quality based effluent limits (WQBELs) as needed.	Provide permit review and oversight as appropriate.	WQBELs are included in permits where reasonable potential is found. Fact Sheets document reasonable potential and WQBELs.	Ongoing	Partial		Completed in Spring 2015.
5.7	Implement State stormwater program.		- Renew One Phase I permit. - Develop and implement general permitting approach for phase two MS4 communities. - Begin renewal of construction stormwater permits	6/15 12/15 6/15 Ongoing	Partial	WQ- 13a WQ- 13b WQ-13c	Progress of DEQ's MS4 program: • The MS4 Program has written the stormwater portion of the Clean Water Service's Phase I permit. As this is a multi-jurisdictional permit that includes

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
			- Implement 1200COLS; 1200C, 1200A and 1200Z permits. - Work with local govt. agencies to assist DEQ in program implementation.	Ongoing			wastewater requirements, it has taken considerable time to renew and is being managed by the Northwest Region. • DEQ has restarted the general permit development process for Phase II MS4s after staffing changes. For industrial and construction stormwater permitting efforts, DEQ has: • Began renewal of construction stormwater permits 10/2014. • Met multiple times with numerous local government agencies to coordinate renewal, as well as implementation of construction and industrial stormwater permits.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
							Worked closely with partners during implementation of new, more stringent Tier II requirements for industrial facilities.
5.8	DEQ will conduct wastewater reuse activities.	EPA will provide TA; timely program support as needed.	Review recycled water use plans and provide technical assistance and program oversight from HQ and regional offices.	Ongoing	Partial		DEQ continues to review recycled water use plans and issue permits that allow water reuse activities. DEQ plans to initiate a recruitment for the biosolids and water reuse program coordinator in the fall 2015.
5.9	DEQ will conduct biosolids/sewage sludge activities.	EPA will provide TA; timely program support as needed.	- Review biosolids management plans during permit renewal or as needed. - Issue land application site authorization letters as needed. - Provide TA and program oversight from each DEQ regional office and HQ.	Ongoing	Partial		DEQ continues to review biosolids management plans and land applications for new and renewed permits. New land application sites are authorized through site authorization letters issued by the regions. DEQ plans to initiate a recruitment for the biosolids and water reuse program coordinator in the fall 2015.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
5.10	Implement the Pretreatment Program.	EPA will provide TA; timely program support as needed.	- DEQ's pretreatment work plan includes: - Oversee development of new programs as necessary, - Provide technical assistance and categorical determinations,	Ongoing	Partial	WQ-14a WQ-14b	-DEQ continuously evaluates pretreatment program modifications to ensure local programs are meeting the federal pretreatment program standards. During FFY14 and 15 DEQ conducted and approved several program modifications for Local Limits review, Industrial User Survey, and Pretreatment Procedure manual updates. -DEQ also provided categorical determination on four industrial permit applications during FFY15. -DEQ continues to manage and update the pretreatment website for program related guidance documents and forms. In FFY15 DEQ developed a factsheet for conducting Industrial User Survey, to be particularly used by,

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
							WW communities without an approved pretreatment program. -DEQ communicates upcoming program related federal requirements and rule proposals to local programs by participating in a monthly Oregon ACWA meeting. During the FFY14 and 15, DEQ participated in 60% of such meetings.
5.11	DEQ will participate in Government Performance and Results Act (GPRA) reporting.	EPA will provide a list of items to be reported under the NPDES permit program by July 1 of each year along with the due dates for each item.	DEQ will provide information required under the GPRA (resources permitting).	6/30/15	Partial	PAMs are under GPRA	No requests of DEQ to provide info to EPA10. DEQ anticipates many permitting/inspection resource facts for GPRA will be provided for the 2015 State Review Framework audit of FFY14.

APPENDIX C: WATER QUALITY PROGRAM COMPONENT

Element 6: Compliance Assurance and Enforcement

DEQ contact: ~~Dennis Ades~~Anita Yap

EPA contact: Jeff Kenknight

Site inspections, compliance assurance and enforcement are key elements of the NPDES permitting program. DEQ and EPA will collaborate to implement Clean Water Act Action Plan implementation policies in Oregon. DEQ will continue to improve permit compliance reporting and public accountability through improvements in electronic reporting system and automated compliance evaluations. DEQ and EPA will coordinate NPDES permitting, compliance and enforcement activities to efficiently achieve program priorities and desired outcomes.

Compliance inspections for major and non-major (minor) sources are scheduled to facilitate permit issuance on a watershed cycle. Offsite evaluations and targeted inspections of other permitted sources are based on environmental outcomes and other criteria; sources with compliance schedules, mutual agreement and orders, or technical assistance needs are prioritized. Enforcement actions follow guidance directives to ensure statewide consistency.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
6.1	DEQ will conduct compliance assistance and compliance assurance activities as appropriate (see additional detail below).	TA and support as needed.	- TA provided to permittees. - DMRs from individual permittees reviewed.	Ongoing	Partial .		During FFY14, DEQ performed nine TA visits of individual permits and two industrial stormwater general permit. DEQ reviewed 2,674 DMRs for the major and minor individual permits during FFY14.
6.2	DEQ will respond to significant public complaints.	TA and support as needed.	- Prompt response to complaints that involve potential significant threats to public health and the environment. - Investigate spills. - Enforcement actions as warranted.	Ongoing	Partial		In October 2011, DEQ implemented an environmental complaint system with info and online complaint form at http://www.deq.state.or.us/complaints/. DEQ resolved/closed 93 WQ complaints in FFY14.
6.3	DEQ will continue its inspection program of major and minor facilities. DEQ will implement the Clean Water Act Compliance Monitoring Strategy (CMS) to ensure	As resources allow, Region may schedule joint and/or oversight inspections with DEQ.	- DEQ will conduct inspections at major facilities every other year. Major facilities that qualify for offsite evaluations will be inspected once each five year permit cycle.	Ongoing	Partial .		Details for the following inspection and enforcement results by DEQ and ODA were submitted to EPA10 with the 2015 State Review Framework audit data for FFY14 in May 2015. For FFY14, DEQ inspected: • 25 of 69 major individual permits;

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
	adequate inspection coverage.		- DEQ will conduct inspections at non-major facilities once every five years. - DEQ will target additional NPDES compliance efforts in targeted watersheds and environmental outcomes or NPDES compliance history. [Not really a new commitment, just added for clarity.] Stormwater: - Inspect 10% of industrial stormwater facilities per year. - Inspect 10% of construction sites 5 acres or larger per year - Inspect 5% of construction sites less than 5 acres per year. - Conduct compliance activities on Phase I and Phase II MS4 permittees. -DEQ will participate in EPA audits of major MS4 programs in Oregon. Pretreatment:				• 48 or 273 minor individual permits; • 81 of 489 or 17% of industrial stormwater permits; • 38 of 357 or 11% of construction stormwater permits for 5 or more disturbed acres; and • 16 of 276 or 5.8% of construction stormwater permits for less than 5 disturbed acres. ODA has a goal of inspecting CAFOs at least once annually and often visit permit holders for compliance assurance more than once each year. During FFY14, ODA performed: • 156 visits for 110 Large CAFOs; • 320 visits for 225 Medium CAFOs; and • 249 visits for 169 Small CAFOs. For DEQ's Ballast Water Program, compliance and enforcement results from FFY14 were: • Universe of Vessel Arrivals regulated by Oregon ballast water regulations (AND used an Oregon dockside facility) = 1,167; • Number of vessel inspections by DEQ ballast water program staff = 142; • Number of Expedited Enforcement Orders issued = 9 (total penalties = $19,100); and

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
			- DEQ will audit three approved active pretreatment programs each year. - During each audit an oversight inspection will be conducted of up to two Industrial Users to the POTW. - DEQ will conduct Pretreatment Compliance Inspections based on annual report results.				• Number of Formal Enforcement Actions = 2 (total penalties = $51,600). DEQ did not participate in any EPA audits of MS4s during FFY14 or through June 30, 2015. DEQ reviewed the annual reports submitted by MS4s during this period. DEQ reviewed the Pretreatment Annual Reports for 2013 and 2014 calendar year and conducted two pretreatment audits during FFY14 through June 30, 2015, and have an audit planned for September 2015. Additional audits are expected to be scheduled before June 30, 2016 DEQ conducted seven joint oversight inspections of industrial facilities with local pretreatment programs. DEQ performed several site visits with local programs during FFY14 and 15.
6.4	DEQ will use the NPDES Compliance Monitoring Strategy Plan and End of Year Report provided by EPA. The annual CMS plan for the upcoming ~~calendar~~federal fiscal year must be submitted to EPA annually by ~~December 31~~the target date of each year. The CMS End of Year report of	Provide draft NPDES Annual CMS Plan and End of Year ~~r~~Report template.	Annual CMS plan ~~and~~ Annual CMS EOY report	Annually by September 15th Annually by December 15th			EPA implemented the revised CMS policy in July and September 2014. DEQ implemented the Permit Issuance and Inspection Planning project in October 2014. In December 2014, DEQ submitted the FFY15 alternate CMS plan with inspection targets specified in element 6.3 in Excel sheets. DEQ received the draft CMS plan/report template from EPA10 in January 2015. DEQ plans to submit the CMS plan (ro~~l~~utine inspection plan with 3-4 major offsite desktop audits) for

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
	the former federal fiscal year must be submitted annually by the target date of each year.						FFY16 by September 15, 2015 using the CMS template. The FFY16 EOY report part of the CMS template will be completed by December 15, 2016. If time and resources allow, DEQ may submit the FFY15 EOY report by December 15, 2015, but will need to populate the CMS plan aspects of the template to do so. Otherwise, DEQ will submit the inspections performed in an Excel sheet by December 15th.
6.5	DEQ will pursue timely and appropriate enforcement actions as warranted.	TA and program support as needed.	Formal enforcement actions taken pursuant to state law and rule.	Ongoing	Partial		DEQ issued and closed a total of 60 NPDES formal enforcement actions in FFY14.
6.6	DEQ will on an annual basis report all final formal enforcement actions issued and/or closed in the previous ~~calendar~~federal fiscal year for all NPDES major and minor facilities		This annual report shall be submitted to EPA by ~~September 30th~~ the target date of each year following the federal fiscal year.- The report shall be formatted to include Case Name, EPA Class, NPDES Permit Number, Case Number, Action Type, Issued Date, Penalty Assessed, Final Penalty Paid, Compliance Complete Date, and Case Closed Date.	~~Ongoing~~ Annually by December 15th	Partial		On May 21, 2015, DEQ provided the final formal enforcement actions that were issued and closed during FFY14 with the 2015 State Review Framework audit data submittal.
6.7	DEQ will work with EPA to update EPA/DEQ agreements, as needed.	EPA will work with DEQ to update EPA/DEQ agreements, as needed.	- EPA/DEQ agreements related to NPDES will be reviewed to determine if revisions are needed. Agreements include	Annually by October 31st of each year	Partial		In April 2015, DEQ and EPA agreed (and documented by email) to adjust elements 6.4 and 6.6 as given with tracked changes in this document. DEQ adds the minor adjustment to elements 6.3, 6.4, and 6.6 and

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
			the 2010 NPDES MOA. EPA will coordinate internally amongst permitting and compliance groups. - DEQ will coordinate internally across DEQ regions, as appropriate. - Updated agreements, as needed				management changes in element summaries as shown with tracked changes. Changes to elements 6.3, 6.4, and 6.6 were reviewed and approved by EPA10 Compliance and Enforcement staff and management on August 13, 2015.
6.8	DEQ will participate in quarterly planning/coordination calls with EPA-NCU.	EPA-NPDES Compliance Unit will participate in quarterly planning/coordination calls with DEQ.	- Coordination of inspection and enforcement work and improved work-sharing, as needed	Timelines per SRF report	Partial		DEQ provided data for the 2015 State Review Framework audit in May 2015. DEQ will try to provide central file review at DEQ HQ. EPA latest plans are to provide DEQ with a list of 30-40 sources a month in advance of the file review now scheduled tentatively for October 2015 by EPA10.
6.9	DEQ, including Regions as appropriate, will meet annually with EPA-NPDES Permitting and Compliance Units to discuss priorities, performance expectations, updates on issues and activities, inspection and enforcement targets, and opportunities for integrating work between EPA and DEQ.	EPA will meet annually with DEQ, including Regions as appropriate, to discuss priorities, performance expectations, updates on issues and activities, inspection and enforcement targets, and opportunities for integrating work between DEQ and EPA.	Annual integrated work planning session.	Annually by October 31st of each year	Partial		Meeting held in 2014 including Dick Pedersen, Dan Opalski, Mike Lidgard, Joni Hammond, Karen Burgess and Jennifer Wigal.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
6.10	Per EPA-OECA protocol, DEQ will complete the annual review and data verification of DEQ-generated compliance and enforcement data in ECHO and ICIS-NPDES during this PPA/PPG period. DEQ will supplement with state data any gaps in ECHO data used for the SRF.	EPA will use ECHO data for FFY 2014 to conduct the next SRF review that begins in spring 2015 and will use ECHO data for FFY 2015 to develop an annual Data Metric Analysis. EPA will consider state data that supplements gaps in the ECHO data.	Verified Data and assessment of SRF metrics based on verified data.	February of each year for verified data.	Partial		In January 2015, DEQ provided the ICIS data verification of major individual permits for FFY14. DEQ supplied verified data of remaining CMS target sources from state databases to EPA in May 2015 for the 2015 State Review Framework audit.
6.11	DEQ will participate in the implementation (e.g., file availability, coordination) of the SRF evaluation scheduled to begin in spring 2015.	EPA will provide DEQ with timely information on the SRF review and will provide DEQ with a draft report for comment prior to the final report.	Quadrennial SRF review and report.	Final SRF Report to be completed no later than Dec 31, 2016.	Partial		DEQ provided data for the 2015 State Review Framework audit in May 2015. DEQ will try to provide central file review at DEQ HQ. EPA latest plans are to provide DEQ with a list of 30-40 sources for file review now scheduled tentatively for October 2015 by EPA10.
6.12	DEQ will address areas of improvement and areas that need attention as identified in the 201~~1~~6 State Review Framework report.	EPA will provide review and input to assist DEQ in addressing SRF findings.	Outputs per each relevant SRF finding.	Timelines per SRF report	Partial		

Element 7: WQ Data Analysis, Management and Monitoring

DEQ contact: Gene Foster (data analysis), Anita Yap (data management), and Aaron Borisenko (monitoring)
EPA contact: Jeannine Brown (data) and Gretchen Hayslip (monitoring)

Water Quality Data Management

Water quality data management is an integral element for the operation of the Water Quality Program. There are a variety of data management systems used by various subprograms in the Water Quality Program including the NPDES, TMDL, NPS, and Monitoring subprograms, as well as the Laboratory Environmental Assessment Division (LEAD). The NPDES data stream is foundational to DEQ's management and EPA's oversight of the Oregon Water Quality program. This performance period will see the Oregon program's continued reporting to ICIS-NPDES. Acquiring an Oregon electronic discharge Monitoring Report (eDMR) submission system will also be necessary in order to prepare for several upcoming rules and changing NPDES reporting requirements.

Water Quality Data Analysis

DEQ has made the development of Watershed Approach Basin Reports a priority in order to guide the agency's efforts to help protect, improve and enhance the quality of Oregon waterways. Each report pulls together available water quality and other environmental information into a single document to produce a basin-based water quality status and action plan. The reports describe water quality conditions and include recommendations for actions that DEQ and others who are interested in these basins can take to improve water quality.

To produce these basin documents, DEQ follows a "watershed approach" that looks at all factors influencing water quality in a certain region. This approach combines the expertise of DEQ's 17 water quality sub-programs with a commitment to working with local stakeholders (communities, watershed councils and conservation districts) to find smart solutions to local water quality issues. It also includes working with applicable local, state and federal agencies on these issues. To support the Watershed Approach DEQ HQ, Region, and LEAD staff analyze water quality data for comparison to water quality standards, beneficial use impairment, and trends. This information is used to support the watershed based planning process.

Water Quality Monitoring

Water quality monitoring and assessment provides the foundation for effective water quality management as well as the basis for tracking violations. Water quality monitoring programs provide information on the status and trends of water quality in Oregon and identify the causes of impairment. Monitoring is conducted to determine if water quality supports beneficial uses, to understand if standards are being met and to identify new water quality problems. Streams that do not meet water quality standards are placed on the 303(d) list and will have TMDLs developed for them. In order to develop TMDLs, studies must be conducted to determine the sources and loads of pollutants affecting the water body and how those vary over time and space. DEQ is engaged in several other types of monitoring studies, including the following:

- Studies to determine the relationship between water quality, habitat conditions and biological condition.
- Studies to determine threats to human and ecological health from toxic compounds.
- Studies to identify threats to groundwater.

LEAD also collects water samples and analyzes the results to support other DEQ programs that respond to inquiries from the public. In addition, the laboratory certifies environmental laboratories in cooperation with ODA and OHA under the National Laboratory Accreditation Program (NELAP). The Laboratory works with other agencies to monitor Oregon's progress under the Oregon Plan for Salmon and Watersheds and provides equipment and technical support to watershed councils for water quality monitoring.

APPENDIX C: WATER QUALITY PROGRAM COMPONENT

Water quality monitoring is necessary to understand how well Oregon is protecting the uses of its water. DEQ monitors water quality by collecting water quality samples, and then performing chemical analysis and statistical analysis of the resulting data. The Water Quality Program is responsible for monitoring and assessing Oregon's 52,000, miles of rivers, 400,000 acres of lakes, 56,000 acres of tidal wetlands, 360 miles of coastal ocean and 206 square miles of estuaries, harbors and bays. DEQ augments its water quality data by using monitoring data from a wide variety of sources, including watershed councils and federal agencies. However, all data must first be reviewed to ensure proper quality control protocols were used.

Environmental Outcome: Effective management and analysis of water quality data provides a means for tracking and assessing the effectiveness of water quality protection and improvement efforts, supporting an adaptive management approach that will result in water quality improvements as measured through water quality monitoring and the other environmental data.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
7.1	DEQ will continue to execute sustainable processes to maintain accurate data transfers from State data systems to ICIS.	EPA R10 will support and assist with acquiring funding from EPA HQ.	- Continued complete and timely data transfers to ICIS through batch upload routines and EPA's ICIS interface screens.	As scheduled by EPA	Partial		DEQ continues to provide accurate/timely electronic transfer and manual input of complete data sets for major sources and Basic WENDB data for non major sources from state data bases to ICIS. DEQ finalized work on an ICIS Network Exchange project with Windsor Solutions Inc. (funding awarded to Windsor Solutions by ECOS) to add

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
							Basic Permit data for non majors and DMR data by electronic transfer to ICIS. Additionally, DEQ began the process to complete an 2012 Exchange Network Grant Project to build additional data flows for General Permits, Permitted Features, Limit Sets, and Limits. This project will allow DEQ to add general permits and limits for non majors to ICIS.
7.2	DEQ will purchase or develop an Electronic Discharge Monitoring Report application and then work toward implementation.	EPA R10 will support and assist with acquiring funding from EPA HQ.	- The capability for individual sources to submit DMRs electronically to Oregon DEQ. - The capability to process DMRs from non-major individual sources and input the data into ICIS.	Ongoing			DEQ worked toward acquiring funding and developing a project to evaluate vendors to purchase an environmental data management

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
							system for CWA/NPDES and other media programs with eDMR that may meet the anticipated phase 1 implementation schedule with required eDMR of the anticipated final electronic reporting rule. Implementation of the environmental data management system (above) with its electronic reporting capability will allow DEQ to process DMRs from non-major individual sources and upload the data to ICIS.
7.3	Ambient Monitoring Network -DEQ will continue to monitor approximately 130 ambient water quality station 6 times annually throughout Oregon. These stations provide status and trends data for understanding water quality.	TA; consultation	- Continue entering data into the database. - The Oregon Water Quality Index (OWQI) will continue to be updated annually. Annual reports will be prepared on water quality trends and indicators.	1/13 1/14	Partial		Monitoring at these locations is ongoing and running very smoothly. Additional water quality

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
			- Data will be used to support the 303(d) assessment process. - Data will be used for the 305(b)/Watershed Assessments.				parameters and sites were added to inform the Biotic Ligand Model. (BLM) and to evaluate the effectiveness of Agricultural Water Quality Management Plan by the Oregon Department of Agriculture
7.4	Collect water quality data to support TMDL development.		TMDL developed on schedule and supported by adequate data.	Ongoing	Partial		Tenmile, Wikkiup Reservoir Nehalem, Nestucca
7.5	Conduct 27 site visits in Oregon as part of the National Coastal Conditions Assessment.		- Provide data for upload to EPA management system. - Use information in the narrative section of the 305(b) report/Watershed Assessments when available.	10/30/2015	Yes		18/27 sites completed. All data has been submitted electronically. Crews are having difficulty getting fish from every site
7.6	Collect water quality, biological data and physical habitat data at 30 randomly selected sites in an Oregon basin or watershed.		Water quality, biological data and physical habitat available for use in integrated report and Basin Assessments	October 2015	Yes		42/63 sites completed as of 8/7/15 Collaboration with ODFW on multiyear effectiveness

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
							project 5/5 completed
7.7	Collect water quality, biological data and physical habitat data at 30 randomly selected sites in an Oregon basins or watershed.		Water quality, biological data and physical habitat available for use in integrated report and Basin Assessments	October 2016	Yes		Next season
7.8	Identify business requirements for migrating DEQ water quality, biology and habitat data into WQX		Business requirements for migration of water quality, biology and habitat data into WQX/STORET identifies	June 2015	Partial		Discussions are on hold while an Electronic Data Management System is identified.
7.9	Conduct analysis of water quality data for Watershed Approach Basin Reports	TA and consultation	Watershed Approach Basin Reports for three basins per year	Ongoing	Partial		Basin assessments for toxics monitoring efforts have been completed Current focus on improving overall assessment process, including Integrated Report.
7.10	DEQ will collaborate with EPA, as resources allow, on EPA monitoring projects conducted in Oregon.	EPA will keep DEQ informed about their monitoring activities in Oregon and share data as it becomes available	To be determined	As scheduled by EPA	Partial		Other than the coastal assessment DEQ is unaware of any EPA monitoring activities in Oregon.

APPENDIX C: WATER QUALITY PROGRAM COMPONENT

Element 8: Management of Nonpoint Sources of Pollution

DEQ contact: Gene Foster
EPA contact: David Croxton

Section 319 of the federal Clean Water Act requires states to have nonpoint source (NPS) management programs based on assessments of the amounts and origins of NPS pollution in the state. The Coastal Zone Act Reauthorization Amendments required development of additional management measures for NPS within the coastal zone. Nonpoint source pollution comes from numerous diffuse sources such as runoff from roads, forestry operations, on-site disposal, farms and construction sites. This type of pollution is understood to be the largest source of water quality impairment in Oregon, as well as the rest of the United States. Federal grants cover the majority of cost for Oregon's NPS program, which protects and restores both surface water and groundwater. During the 2014-2016 biennium, DEQ expects to provide close to $2 million to local organizations for nonpoint source projects such as public education and watershed restoration. DEQ's NPS program also includes staff, which performs the following activities:

- Characterization of NPS problems/concerns.
- Monitoring to support and determine effectiveness of BMP programs.
- Best management practices development/implementation.
- Coordination between stakeholders.
- Liaison support staff to other state and federal agencies.
- Restoration activities.
- Development and modeling for NPS TMDLs.
- Development of UAA/SSC as related to NPS activities; and
- Public education.

Another area of work involves supporting ODA in the implementation of the Agriculture Water Quality Management Program and biennial reviews of area plans and rules. Basin coordinators and HQ staff analyze existing water quality data and provide a summary of the analysis to ODA and Local Advisory Committees for biennial reviews. DEQ will compare water quality data to water quality standards and analyze the water quality data for trends. The purpose of DEQ participation is to ensure that updated water quality information is considered during biennial reviews. Basin coordinators and HQ staff will also be involved in the design and application of ODA's effectiveness monitoring of area plans. When ODA is in the planning stages to develop effectiveness monitoring studies to evaluate how well area plans and rules are meeting TMDL load allocations, DEQ will assist in the formulation of the goals and objectives (the questions to be answered) of the monitoring study. The purpose of DEQ's participation is to ensure that the study is focused on outcomes that are directly related to load allocation targets and to ensure that the data collected and the analysis proposed is sufficient to answer these questions.

Environmental Outcome: Active management and control of nonpoint sources of pollution will reduce the amount of nonpoint source pollution getting into Oregon's waterways, resulting in water quality improvements as measured by water quality data and measures in WQMPs and TMDL implementation plans.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
8.1	Distribute 319 grants to fund project proposals to Oregon's priority basins based on TMDL development and implementation, drinking	Assist with criteria updates as needed. Target Oregon's priority watersheds for funding. Provide technical support and review of basin plans based on TMDL development and	Solicit and select projects.	05/15 and 05/16	YES		NPS Management Plan completed. Waiting for EPA funding for

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
	water source areas and GWMAs.	implementation and the 9-Key Elements for watershed based planning.					2015 319 Grant, once received DEQ is ready to disburse pass through funds
8.2	Prepare an annual report of NPS program accomplishments.	Review and take final action on annual report.	NPS Annual Report	03/15 and 03/16	YES		Completed for 2014
8.3	Determine with EPA available NPS Success Stories documenting either water quality progress or full restoration under PAM.	Provide assistance in development of NPS Success Stories.	NPS Success Stories	9/14 and 9/15	YES	SP-12 WQ-10	ongoing
8.4	Enter GRTS 319 mandated elements to 319 project tracking data by national deadlines, including load reductions as available.	Provide technical assistance for GRTS-related function.	Data reflecting progress and status of 319 implementation.	2/15, 2/16 load reduction, other GRTS data (National GRTS reporting deadlines	YES	WQ-9a WQ-9b WQ-9c	Completed for 2014, ongoing for 2015
8.5	Work with EPA to review TMDLs and other basins plans for meeting EPA's 9 Key Element watershed based planning guidance.	Provide technical support and review of basin plans based on TMDL development and implementation and the 9 Key Elements watershed guidance.	Develop strategies to leverage current resources for development of a watershed framework that integrates TMDLs and NPS Programs and is consistent with EPAs 9 Key Elements watershed plan model. Inform DEQ HQ and Regional staff about the Watershed Framework and the linkages between the various DEQ Water Quality subprograms. Develop conceptual model for management	6/13	YES		Ongoing

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM	Comments
			practice reporting system for implementation monitoring of WQMPs.				
8.6	Implement Agency Toxics Reduction Strategy.		Implement a toxics reduction strategy that incorporates air, land and water. This effort includes the Pesticide Stewardship Partnerships, Pesticide Collection Events, and other priority activities.	Ongoing	Partial		Ongoing
8.7	Ag Area Plan & Rule biennial reviews and ODA/DEQ MOA implementation	TA and consultation	Review and comment on ODA's agricultural area rules and plans during their biennial review process.	Ongoing	Partial		Ongoing

Element 9: Source Water Protection

DEQ contacts: Gene Foster
EPA contacts: Susan Eastman

Source Water Protection Program

The Safe Drinking Water Act Amendments (SDWA) of 1996 provided resources to states to focus more attention on the source areas for public water systems instead of solely relying upon treatment to achieve clean drinking water. Approximately 75% of Oregon's citizens get their drinking water from public water systems. To address the assessment requirements of the SDWA, the Oregon Health Authority (OHA), teamed up with the Department of Environmental Quality (DEQ). The two agencies have established a Memorandum of Understanding to coordinate their ongoing work.

The two agencies have worked closely since 1998 to share the responsibilities of implementing the program. DEQ's role in that work includes computer database/GIS system maintenance, contamination source inventories, surface water delineations, and susceptibility analyses. DEQ provides technical assistance to public water systems and communities to develop and implement drinking water protection actions. Source water protection is accomplished through the implementation of Clean Water Act (CWA). DEQ works to reduce pollutants in source waters through various point and nonpoint source control programs so that the source waters meet CWA standards.
DEQ's source water protection work is reported to EPA Region 10 in its annual report---upcoming submittal dates are September 2014 and September 2015. These annual reports are completed in conjunction with the OHA and include an accounting of the total population and public water systems that implement new source water protection strategies every year.

Element 10: Clean Water State Revolving Fund Program

DEQ contacts: Anita Yap
EPA contacts: Paula vanHaagen

Clean Water State Revolving Fund (CWSRF) Program

In 1987 Congress established the CWSRF program to replace the Construction Grants program that provided direct grants to communities to complete sewer infrastructure projects. EPA oversees the CWSRF program and each state and Puerto Rico to implement the program. The program makes low-interest funding available to address water quality. Congress continues to appropriate funds to EPA for the purpose of capitalizing the CWSRF program each year. Each state must contribute a minimum matching amount of 20 percent of its federal grant to the program annually.

DEQ administers the CWSRF program in Oregon and provides low-cost loans and bond purchase agreements for the planning, design and construction of a variety of projects that address water quality improvement and protection. Oregon laws allow the use of these funds to public agencies only including cities, counties, sanitary districts, soil and water conservation districts, irrigation districts, school districts, and various special districts. A majority of the funds are provided to cities that address wastewater treatment needs and thus help to meet the state's water quality standards. These standards are necessary to protect beneficial uses such as recreation, fish habitat, boating, irrigation and drinking water. While continuing to serve traditional municipal wastewater needs, the CWSRF program also provides funding and incentives to address nonpoint source water pollution and is integrating sustainable approaches to water quality improvement and protection. Each type of loan or bond purchase agreement DEQ offers has different financial terms, and is intended to provide communities with choices when financing water quality improvements. In 2010, DEQ hired two regional engineers who work directly with communities to ascertain sustainable wastewater infrastructure needs and incorporate feasible approaches, and to identify available financial options. DEQ also continues to work with other funding agencies in Oregon to assist communities by identifying viable financing options for eligible projects.

Each year Oregon's program makes approximately $50 million available statewide for water quality improvements. Oregon's capitalization grant in 2014 will provide approximately $15 million of the $185 million available funds. To date, DEQ has provided loans to 149 communities totaling more than $1.1 billion. This includes about $44.3 million provided to 13 projects under the American Recovery and Reinvestment Act of 2009."

In 2013, DEQ worked to implement the recommendations for the 2012 rulemaking advisory committee report. DEQ continues to work on implementation of the longer-term financing rules that were adopted by the Environmental Quality Commission in January 2014. In 2014 DEQ will work with EPA Region 10 staff to develop an alternative State Environmental Review Process (SERP). In the alternative SERP, DEQ will identify categories of projects that will be waived from demonstration of compliance with applicable environmental cross-cutting authorities.DEQ will continue to provide assistance to small communities and help small communities develop more green infrastructure projects.

Although EPA oversees the CWSRF program, federal regulations allow states broad flexibility in establishing and implementing their revolving funds. EPA works closely with each state in providing technical assistance and oversight to ensure consistency with federal regulations. DEQ and EPA Region 10 maintain a mutual agreement to operate the program in Oregon which stipulates the procedures and expectations of the program. EPA's regional Oregon CWSRF coordinator and DEQ's CWSRF program staff work closely together in support of Oregon's program. EPA evaluates Oregon's financial and program procedures each year through a site visit and annual report. DEQ provides EPA with an intended plan for the state's use of its fund annually, and also provides an annual report to EPA on the program's accomplishments during the state fiscal year. DEQ will report on environmental outcomes by completing an environmental benefits evaluation for each project in EPA's environmental benefits system for the CWSRF.

APPENDIX C: WATER QUALITY PROGRAM COMPONENT

What is a Program Activity Measure (PAM)?

From the "National Water Program Guidance Appendix: FY 2006 Final Measures and Commitments".

"PAMs address activities to be implemented by EPA Headquarters, EPA Regional Offices, or by States/Tribes that administer national programs. They are the basis for monitoring progress in implementing programs to accomplish the environmental improvements described in the new Strategic plan."

In April of 2005, the National Water Program published Guidance describing strategies for meeting the water related goals established in the Environmental Protection Agency Strategic Plan and defining the measures to be used to assess progress in meeting the goals in the Plan in FY 2008. Some of the measures included "targets," or increments of progress that might be accomplished under the measures in FY 2008.

The Guidance includes an Appendix that identifies the specific measures that support each water subobjective Plan. The Appendix includes all measures related to water programs, including the environmental/public health measures state in the EPA Strategic Plan (i.e. subobjectives and strategic targets) and the measures of activity in a range of program areas that support each subobjective (i.e. Program Activity Measures or PAMs).

What PAMs apply to the PPA?

The matrix has a column identifying the EPA PAMs. These have been suggested by the EPA program managers as appropriate.

Where can I go for additional information regarding PAMs?

http://www.epa.gov/water/waterplan/documents/05guidance.html